



STATE OF IDAHO  
DEPARTMENT OF  
ENVIRONMENTAL QUALITY

1410 North Hilton • Boise, Idaho 83706-1255 • (208) 373-0502

Dirk Kempthorne, Governor  
C. Stephen Alfred, Director

April 2, 2003

**Certified Mail No. 7099 3220 0009 1976 0190**

Arvin Cooper  
Owner  
Cooper Ready-Mix  
11 Cooper Circle  
Salmon, ID 83467

RE: AIRS Facility No. 777-00314, Cooper Ready-Mix, Salmon  
Final Tier II Operating Permit Letter

Dear Mr. Cooper:

The Department of Environmental Quality (Department) is issuing Tier II operating permit number T2-020512 for the Cooper Ready-Mix, facility located at 11 Cooper Circle, Salmon, ID, in accordance with IDAPA 58.01.01.400 through 406, *Rules for the Control of Air Pollution in Idaho (Rules)*.

The enclosed Tier II operating permit is based on the information contained in your permit application and on the relevant comments received during the public comment period. Modification to and/or renewal of this Tier II permit shall be requested in a timely manner in accordance with the *Rules*.

Rensay Owen of the Idaho Falls Regional Office will contact you regarding a meeting with the Department to discuss the permit terms and requirements. The Department recommends the following representatives attend the meeting: your facility's plant manager, responsible official, environmental contact, and any operations staff responsible for day-to-day compliance with permit conditions.

Pursuant to IDAPA 58.01.23, you, as well as any other entity, may have the right to appeal this final agency action within 35 days of the date of this decision. However, prior to filing a petition for a contested case, I encourage you to call Mike Simon at (208) 373-0502 to address any questions or concerns you may have with the enclosed permit.

Sincerely,

Stephen E. West, Administrator  
Air Quality Division

SEW/MS/AJM/sd Permit No. T2-020512

Enclosure



**Air Quality  
TIER II OPERATING PERMIT**

State of Idaho  
Department of Environmental Quality

PERMIT NO.: T2-020512

AIRS FACILITY NO.: 777-00314

AQCR: 63

CLASS: B

SIC: 3273

ZONE:

UTM COORDINATE (km): Portable

**1. PERMITTEE**

Cooper Ready-Mix

**2. PROJECT**

Concrete Batch Plant

**3. MAILING ADDRESS**

11 Cooper Circle

**CITY**

Salmon

**STATE**

ID

**ZIP**

83467

**4. FACILITY CONTACT**

Arvin Cooper

**TITLE**

Owner

**TELEPHONE**

208-756-4475

**5. RESPONSIBLE OFFICIAL**

Frances Cooper

**TITLE**

Owner

**TELEPHONE**

208-756-4475

**6. EXACT PLANT LOCATION**

11 Cooper Circle, Salmon, Idaho

**COUNTY**

Lemhi

**7. GENERAL NATURE OF BUSINESS & KINDS OF PRODUCTS**

Concrete Manufacturing

**8. PERMIT AUTHORITY**

This permit is issued according to the *Rules for the Control of Air Pollution in Idaho*, IDAPA 58.01.01.400, and pertains only to emissions of air contaminants regulated by the state of Idaho and to the sources specifically allowed to be operated by this permit.

This permit has been granted on the basis of design information presented in the application and the Idaho Department of Environmental Quality's technical analysis of the supplied information. Changes in design or equipment that result in any change in the nature or amount of emissions may be considered a modification. Modifications are subject to Department review in accordance with IDAPA 58.01.01.200.

  
C. STEPHEN ALLRED, DIRECTOR  
DEPARTMENT OF ENVIRONMENTAL QUALITY

DATE ISSUED: April 2, 2003

DATE EXPIRES: April 2, 2008

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## ACRONYMS, UNITS, AND CHEMICAL NOMENCLATURE

acfm	actual cubic feet per minute
AQCR	Air Quality Control Region
CFR	Code of Federal Regulations
CO	carbon monoxide
cy/hr	cubic yards per hour
Department	Department of Environmental Quality
EPA	Environmental Protection Agency
IDAPA	A numbering designation for all administrative rules in Idaho promulgated in accordance with the Idaho Administrative Procedures Act
km	kilometer
lb/hr	pound per hour
NO <sub>x</sub>	nitrogen oxides
O&M	Operations and Maintenance
PM	particulate matter
PM <sub>10</sub>	particulate matter with an aerodynamic diameter less than or equal to a nominal 10 micrometers
SIC	Standard Industrial Classification
SO <sub>2</sub>	sulfur dioxide
T/yr	tons per year
UTM	Universal Transverse Mercator
VOC	volatile organic compound

**AIR QUALITY TIER II OPERATING PERMIT NUMBER: T2-020512**

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<b>Location:</b>	Salmon, Idaho	777-00314	<b>Date Expires:</b>	April 2, 2008

**1. TIER II OPERATING PERMIT SCOPE*****Purpose***

- 1.1 This Tier II operating permit establishes facility operating, monitoring, and recordkeeping requirements to comply with ambient air quality standards.
- 1.2 This is the initial operating permit for this facility.

***Regulated Sources***

- 1.3 Table 1.1 lists all sources of regulated emissions in this permit.

**Table 1.1 SUMMARY OF REGULATED SOURCES**

<b>Permit Section</b>	<b>Source Description</b>	<b>Emissions Control(s)</b>
3	<u>Cement silo</u> Manufacturer: Ideal Manufacturing, Inc. Model: Fast-way Maximum hourly throughput: 16 cy/hr	<u>Cement silo baghouse</u> Manufacturer: Ideal Manufacturing Inc. Efficiency: 99.8% for PM Exit air flow rate: 450 acfm

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**2. FACILITY-WIDE CONDITIONS**

***Fugitive Emissions***

- 2.1 All reasonable precautions shall be taken to prevent PM from becoming airborne in accordance with IDAPA 58.01.01.650-651. In determining what is reasonable, considerations will be given to factors such as the proximity of dust-emitting operations to human habitations and activities and atmospheric conditions that might affect the movement of PM. Some of the reasonable precautions include, but are not limited to, the following:
- Use, where practical, of water or chemicals for control of dust in the demolition of existing buildings or structures, construction operations, the grading of roads, or the clearing of lands.
  - Application, where practical, of asphalt, oil, water, or suitable chemicals to, or covering of dirt roads, material stockpiles, and other surfaces that can create dust.
  - Installation and use, where practical, of hoods, fans and fabric filters, or equivalent systems to enclose and vent the handling of dusty materials. Adequate containment methods should be employed during sandblasting or other operations.
  - Covering, where practical, of open-bodied trucks transporting materials likely to give rise to airborne dusts.
  - Paving of roadways, where practical, and their maintenance in a clean condition.
  - Prompt removal, where practical, of earth or other stored material from streets.
- 2.2 The permittee shall monitor and maintain records of the frequency and the method(s) used (i.e., water, chemical dust suppressants, etc.) to reasonably control fugitive emissions.
- 2.3 The permittee shall maintain records of all fugitive dust complaints received. The permittee shall take appropriate corrective action as expeditiously as practicable after receipt of a valid complaint. The records shall include, at a minimum, the date each complaint was received and a description of the following: the complaint, the permittee's assessment of the validity of the complaint, any corrective action taken, and the date the corrective action was taken.
- 2.4 The permittee shall conduct a quarterly facility-wide inspection of potential sources of fugitive emissions, during daylight hours and under normal operating conditions, to ensure that the methods used to reasonably control fugitive emissions are effective. If fugitive emissions are not being reasonably controlled, the permittee shall take corrective action as expeditiously as practicable. The permittee shall maintain records of the results of each quarterly fugitive emissions inspection. The records shall include, at a minimum, the date of each inspection and a description of the following: the permittee's assessment of the conditions existing at the time fugitive emissions were present (if observed), any corrective action taken in response to the fugitive emissions, and the date the corrective action was taken.

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***Visible Emissions***

- 2.5 The permittee shall not discharge any air pollutant to the atmosphere from any point of emission for a period or periods aggregating more than three minutes in any 60-minute period which is greater than 20% opacity as determined by procedures contained in IDAPA 58.01.01.625. These provisions shall not apply when the presence of uncombined water, NO<sub>x</sub>, and/or chlorine gas is the only reason for the failure of the emission to comply with the requirements of this section. Visible emissions shall not be observed leaving the property boundary for a period or periods aggregating more than three minutes in any 60-minute period. Visible emissions shall be determined by EPA Reference Method 22 (as described in 40 CFR 60), or Department-approved alternative method.
- 2.6 The permittee shall conduct quarterly a facility-wide inspection of potential sources of visible emissions during daylight hours and under normal operating conditions. The visible emissions inspection shall consist of a see/no see evaluation for each potential source. If any visible emissions are present from any point of emission, the permittee shall either take appropriate corrective action as expeditiously as practicable, or perform a Method 9 opacity test in accordance with the procedures outlined in IDAPA 58.01.01.625. A minimum of 30 observations shall be recorded when conducting the opacity test. If opacity is greater than 20% for a period or periods aggregating more than three minutes in any 60-minute period, the permittee shall take all necessary corrective action and report the exceedance in accordance with IDAPA 58.01.01.130-136. The permittee shall maintain records of the results of each quarterly visible emissions inspection and each opacity test when conducted. The records shall include, at a minimum, the date and results of each inspection and test and a description of the following: the permittee's assessment of the conditions existing at the time visible emissions are present (if observed), any corrective action taken in response to the visible emissions, and the date corrective action was taken.

***Excess Emissions***

- 2.7 The permittee shall comply with the procedures and requirements of IDAPA 58.01.01.130-136 for excess emissions due to startup, shutdown, scheduled maintenance, safety measures, upsets, and breakdowns.

***Open Burning***

- 2.8 The permittee shall comply with the requirements of the *Rules for Control of Open Burning*, IDAPA 58.01.01.600-616.

***Air Stagnation Advisory Days***

- 2.9 The permittee shall comply with the Air Pollution Emergency Rules in IDAPA 58.01.01.550-562.

***Monitoring and Recordkeeping***

- 2.10 The permittee shall maintain sufficient records to ensure compliance with all of the terms and conditions of this operating permit. Records of monitoring information shall include, but not be limited to, the following: (a) the date, place, and times of sampling or measurements; (b) the date analyses were performed; (c) the company or entity that performed the analyses; (d) the analytical techniques or methods used; (e) the results of such analyses; and (f) the operating conditions existing at the time of sampling or measurement. All monitoring records and support information shall be retained for a period of at least five years from the date of the monitoring sample, measurement, report, or application. Supporting information includes, but is not limited to, all calibration and maintenance records, all original strip-chart recordings for continuous monitoring instrumentation, and copies of all reports required by this permit. All records required to be maintained by this permit shall be made available in either hard copy or electronic format to Department representatives upon request.

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***Certifications***

- 2.11 All documents submitted to the Department, including, but not limited to, records, monitoring data, supporting information, requests for confidential treatment, testing reports, or compliance certifications, shall contain a certification by a responsible official. The certification shall state that, based on information and belief formed after reasonable inquiry, the statements and information in the document(s) are true, accurate, and complete.

***Reporting***

- 2.12 At least 10 days prior to relocation of any equipment covered by this permit, the permittee shall submit a complete Portable Equipment Registration and Relocation Form (available on the Department's Web site, [www.deq.state.id.us/air/equip\\_relocat.htm](http://www.deq.state.id.us/air/equip_relocat.htm)) in accordance with IDAPA 58.01.01.500 and a scaled plot plan to the following address:

PERF Processing Unit  
Idaho DEQ - Air Quality  
1410 N. Hilton  
Boise, ID 83706-1255

***Obligation to Comply***

- 2.13 Receiving a Tier II operating permit shall not relieve any owner or operator of the responsibility to comply with all applicable local, state, and federal rules and regulations.



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**3. CEMENT SILO**

- 3.1 This Tier II operating permit authorizes the use of a single, Ideal Manufacturing Inc., Fast-way model, cement-dispensing silo. The manufacturer supplied emission controls are particulate filtration bags attached to the silo's exhaust ports. The filtration bags are rated at 99.8% removal efficiency for PM.

***Operating Requirements***

- 3.2 The permittee may operate this portable cement plant with up to two rock crushers at the same property location. The rock crushers must have appropriate air quality permits to operate.
- 3.3 The permittee shall operate and maintain the baghouse filter within O&M manual specifications.
- 3.4 The permittee shall not exceed 70,800 cubic yards of concrete per any consecutive 12-month period.

***Monitoring and Recordkeeping Requirements***

- 3.5 The permittee shall develop and O&M manual within 90 days of issuance of this permit. The O&M manual shall be maintained on-site at all times and shall address the proper operation and maintenance of the cement silo baghouse. The manual shall include, but is not limited to, the following: a general description of the control device, pressure drop range across the baghouse which indicates normal operation, and provisions of routine inspections.
- 3.6 The following operating parameters shall be monitored and recorded as specified:
- When in operation, the pressure drop across the baghouse once on a daily basis;
  - Concrete production in cubic yards per month and cubic yards per consecutive 12-month period.

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**4. FACILITY-WIDE EMISSIONS INVENTORY**

Table 4.1 provides a summary of the emissions inventory of the facility based on potential to emit. The emissions inventory table is provided for informational purposes only.

**Table 4.1 SUMMARY OF EMISSIONS INVENTORY**

Cooper Ready-Mix, Salmon, Idaho Potential Emissions <sup>a</sup> – Hourly (lb/hr), and Annual (T/yr)										
Source Description	PM <sub>10</sub>		NO <sub>x</sub>		CO		VOC		SO <sub>2</sub>	
	lb/hr	T/yr	lb/hr	T/yr	lb/hr	T/yr	lb/hr	T/yr	lb/hr	T/yr
Cement Silo Baghouse	0.140	0.60	--	--	--	--	--	--	--	--

<sup>a</sup> As determined by a pollutant-specific EPA reference method, Department-approved alternative, or as determined by the Department's emissions estimation methods used in this permit analysis.

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**5. TIER II PERMIT GENERAL PROVISIONS**

1. All emissions authorized herein shall be consistent with the terms and conditions of this permit. The emission of any pollutant in excess of the limitations specified herein, or noncompliance with any other condition or limitation contained in this permit, shall constitute a violation of this permit and the *Rules for the Control of Air Pollution in Idaho*, and the Environmental Protection and Health Act, Idaho Code 39-101 et seq.
2. The permittee shall at all times (except as provided in the *Rules for the Control of Air Pollution in Idaho*) maintain and operate in good working order all treatment or control facilities or systems installed or used to achieve compliance with the terms and conditions of this permit and other applicable laws for the control of air pollution.
3. The permittee shall allow the Director, and/or his authorized representative(s), upon the presentation of credentials:
  - To enter upon the permittee's premises where an emissions source is located, or in which any records are required to be kept under the terms and conditions of this permit; and
  - At reasonable times, to have access to and copy any records required to be kept under the terms and conditions of this permit, to inspect any monitoring methods required in this permit, and to require stack emissions testing (i.e., performance tests) in conformance with state-approved or accepted EPA procedures when deemed appropriate by the Director.
4. Except for data determined to be confidential under Section 9-342A *Idaho Code*, all reports prepared in accordance with the terms of this permit shall be available for public inspection at the appropriate regional office of the Department of Environmental Quality.
5. Nothing in this permit is intended to relieve or exempt the permittee from compliance with any applicable federal, state, or local law or regulation, except as specifically provided herein.
6. In the event of any change in control or ownership of source(s) from which the authorized emissions emanate, the permittee shall notify the succeeding owner or controller of the existence of this permit by letter; a copy of which shall be forwarded to the Director.
7. This permit shall be renewable on the expiration date, provided the permittee submits any and all information necessary for the Director to determine the amount and type of air pollutants emitted from the equipment for which this permit is granted. Failure to submit such information within 60 days after receipt of the Director's request shall cause the permit to become void.
8. The provisions of this permit are severable, and if any provision of this permit to any circumstance is held invalid, the application of such provision to other circumstances, and the remainder of this permit, shall not be affected thereby.